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August 1, 2013

Mrs. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Appellant: Richard Senturia, Consultant for the Applicant (CRN: 16040892)  
Applicant: St. Raymond High School for Boys  
BEN: 10626

471#:	FRN#
572072	1580306, 1580331, 1580408
613074	1688433, 1688470, 1688573
749777	2025700, 2025707, 2025739
813455	2120359, 2120391, 2120423

Re: **Request for Review**

Administrator Denial for Invoice Deadline Extension Requests dated 06/05/13 and Earlier  
CC Docket No. 02-6

Dear Mrs. Dortch:

We are appealing USAC's denial of invoice deadline extension requests and subsequent appeals for the above referenced FRNs in letters dated June 18, 2013 and later, having the following explanation(s):

- **Current invoice deadlines and procedures require that Invoice Deadline Extension requests be filed by the end of the relevant invoice receipt period for the service category of the FRN requiring an extension. The invoice receipt deadline is 120 days after the end of the service delivery date or 120 days after the date of the Form 486 Notification Letter whichever is later. USAC rejected your request for Invoice Deadline Extension because the request was not filed in a timely manner. Since USAC's decision was consistent with Invoice Deadline Extension guidelines, your appeal is denied.**

In our original requests and subsequent appeals we explained to USAC that the applicant experienced administrative changes beyond its control resulting in loss of institutional knowledge of E-Rate and its rules, regulations policies, procedures and guidelines. These changes made it virtually impossible for the applicant to maintain internal controls. Subsequently, the applicant failed to file timely BEAR/SPI Election Letters resulting in loss of committed funds.

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There is precedence for waving procedural deadlines for reasons beyond the applicant's control.

Granting this waiver of a procedural deadline the serves the public interest.

Granting this deadline extension waiver does not promote waste, fraud or abuse.

We respectfully request approval of this invoice deadline extension appeal to allow the applicant to recover funds committed it that it has already paid for eligible services.

For the Applicant,

Richard Senturia, CEO  
erp@erateprogram.com  
eRateProgram, LLC